

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

JEFFREY ALONZO SIMMS,

Plaintiff,

v.

HARRY M. FREEDMAN, M.D.,  
DONNA BURNS, DR., and  
MAJOR R. L. HUGHES,

Defendants.

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C.A. No. 04-1205-SLR

TRIAL BY JURY OF  
TWELVE DEMANDED

**DEFENDANT HARRY M. FREEDMAN, M.D.'S  
RESPONSE TO PLAINTIFF'S MOTION**

COMES NOW, defendant Harry M. Freedman, M.D. (hereinafter referred to as "Dr. Freedman"), by and through undersigned counsel, hereby responds to plaintiff's Motion docketed on May 1, 2006, and states as follows:

1. This Motion is unintelligible and Dr. Freedman is unable to file a response thereto.

ELZUFON AUSTIN REARDON  
TARLOV & MONDELL, P.A.

/S/Diane M. Andrews  
DIANE M. ANDREWS, ESQUIRE #4067  
300 Delaware Avenue, Suite 1700  
P.O. Box 1630  
Wilmington, DE 19899-1630  
(302) 428-3181  
Attorney for Dr. Freedman

DATE: May 4, 2006